

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

REPAIRIFY, INC.,
a Delaware corporation,

Plaintiff,

V.

**KEYSTONE AUTOMOTIVE
INDUSTRIES, INC.,
a California corporation
d/b/a Elitek Vehicle Services, and
DOES 1 through 20, inclusive,**

Defendants.

6:21-cv-00819-ADA

JURY TRIAL DEMANDED

JOINT NOTICE OF SETTLEMENT

Plaintiff Repairify, Inc. (“Repairify”) and Defendant Keystone Automotive Industries, Inc. d/b/a Elitek Vehicle Services (“Elitek”) (collectively, “the Parties”) hereby file this Joint Notice of Settlement.

The Parties have reached a settlement in this case, and therefore, jointly request that all Court deadlines be stayed.

Dated: April 9, 2025

Respectfully submitted,

By: /s/ Joseph W. Winkels
Philip P. Caspers (*pro hac vice*)
J. Derek Vandenburg (*pro hac vice*)
Joseph W. Winkels (*pro hac vice*)
William F. Bullard (*pro hac vice*)
Ryan D. Rypka (*pro hac vice*)
**CARLSON, CASPERS, VANDENBURGH &
LINDQUIST, P.A.**
225 S. Sixth Street, Suite 4200
Minneapolis, MN 55402
Phone: (612) 436-9600

By: /s/ Barry F. Irwin
Barry F. Irwin, P.C. (admitted *pro hac*)
Joseph A. Saltiel (admitted *pro hac*)
IRWIN IP LLP
150 N. Wacker Dr., Ste 700
Chicago, IL 60606
(312) 667-6080 (Telephone)
birwin@irwinip.com
jsaltiel@irwinip.com

Barry K. Shelton

Fax: (612) 436-9605
pcaspers@carlsoncaspers.com
dvandenburg@carlsoncaspers.com
jwinkels@carlsoncaspers.com
wbullard@carlsoncaspers.com
rrypka@carlsoncaspers.com

Deron Dacus (State Bar No. 0090553)
THE DACUS FIRM, P.C.
821 ESE Loop 323, Suite 430
Tyler, Texas 75701
Phone: (903) 705-1117
Fax: (903) 581-2543
ddacus@dacusfirm.com

Counsel for Plaintiff Repairify, Inc.

Texas State Bar No. 24055029
WINSTON & STRAWN LLP
2121 N. Pearl Street, Suite 900
Dallas, TX 75201
bshelton@winston.com
(214) 453-6407 (Telephone)

Mark D. Siegmund
Texas State Bar No. 24117055
CHERRY JOHNSON
SIEGMUND JAMES PLLC
400 Austin Avenue, 9th Floor
Waco, TX 76701
msiegmund@cjsjlaw.com
(254) 732-2242 (Telephone)

*Counsel for Defendant Keystone Automotive
Industries, Inc. d/b/a Elitek Vehicle Services*

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this filing via the Court's CM/ECF system per Local Rule CV-5(a) on April 9, 2025.

/s/ Joseph W. Winkels

Joseph W. Winkels